

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Newport News Division**

In re: E&E Investment Group, LLC,

Case No. 15-50249-__
Chapter 11

Debtor in Possession.

**APPLICATION TO EMPLOY CROWLEY,
LIBERATORE, RYAN & BROGAN, P.C.
AS COUNSEL FOR DEBTOR IN POSSESSION**

COMES NOW, E&E Investment Group, LLC (the “Debtor”), by counsel, and applies to this Court for authority to employ Crowley, Liberatore, Ryan & Brogan, P.C. (“CLRB”) as its attorney, alleging:

1. The Debtor filed its voluntary petitions under Chapter 11 of Title 11, United States Code, in this Court on March 2, 2015 (“Filing Date”). The Order for relief was entered on that date. The Debtor is a debtor in possession having the rights, powers and duties afforded a trustee by 11 U.S.C. §1107.

2. To perform the duties of Debtor in Possession, the Debtor requires the services of attorneys for the following purposes:

- a. To prepare the petition, lists, schedules and statements required by 11 U.S.C. §521; the pleadings, motions, notices and orders required for the orderly administration of the estate and to ensure the progress of this case; and to consult with and advise the Debtor in the reorganization of its financial affairs.

Karen M. Crowley, VSB No. 35881
Crowley, Liberatore, Ryan & Brogan, P.C.
Town Point Center, Suite 300
150 Boush Street
Norfolk, VA 23510
Telephone – (757) 333-4500
Facsimile – (757) 333-4501
Proposed Counsel for the Debtor

- b. To prepare for, prosecute, defend, and represent the Debtor's interest in all contested matters, adversary proceedings, and other motions and applications arising under, arising in, or related to this case.
- c. To advise and consult concerning administration of the estate in this case, concerning the rights and remedies with regard to the Debtor's assets; concerning the claims of administrative, secured, priority, and unsecured creditors and other parties in interest.
- d. To investigate the existence of other assets of the estate; and, if any exist, to take appropriate action to have the same turned over to the estate, including instituting lawsuits and investigating whether lawsuits exist.
- e. To prepare a Disclosure Statement and Plan of Reorganization for the Debtor, and negotiate with all creditors and parties in interest who may be affected thereby; to obtain confirmation of a Plan, and perform all acts reasonably calculated to permit the Debtor to perform such acts and consummate a Plan.

3. For the foregoing and all other necessary and proper purposes, the Debtor desires to employ CLRB as counsel for the Debtor.

4. CLRB specializes in bankruptcy proceedings and debtor/creditor matters. Because of the firm's experience in those fields, it is well qualified to render the foregoing services.

5. The Declaration of Karen M. Crowley, Esquire is attached hereto as Exhibit A. She is a member of Crowley, Liberatore, Ryan & Brogan, P.C. No member or associate of said law firm holds or represents any interest adverse to that of the Debtors or its estate and all members and associates are disinterested persons. To the extent that a conflict develops with Metrovest, LLC, the Debtor agrees that it will retain conflict counsel.

6. CLRB has been paid a total of \$1,320.00 for pre-petition work performed for the Debtor relating to this case as well as \$1,717.00 towards the filing fee in this case. CLRB continues to hold a \$8,663.00 retainer to use toward its post-petition court approved work.

7. It is contemplated that CLRB will seek compensation for professionals and paraprofessionals based upon hourly rates multiplied by the number of hours engaged in the matters described in paragraph 2, plus reimbursement for its out of pocket expenses. A copy of the engagement letter dated February 27, 2015 setting forth the terms of CLRB's employment by the Debtor in this case, if approved, is attached as Exhibit B.

8. CLRB reserves the right to amend this Application to disclose other relevant facts which are not now known, but which may be revealed to CLRB during the administration of this case, and to disclose any changes occurring to the facts disclosed herein.

WHEREFORE, the Debtor respectfully moves this Court pursuant to 11 U.S.C. § 327(a), to enter an Order authorizing employment of Crowley, Liberatore, Ryan & Brogan, P.C. as its attorney to render services in the areas described above, with compensation to be paid as an administrative expense at the times and in the amounts as this Court may hereinafter determine and allow.

E&E INVESTMENT GROUP, LLC

BY: /s/ Karen M. Crowley
Of Counsel

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Certificate of Service

I certify that on March 2, 2015, a true copy of the foregoing Application was sent via first class mail, postage prepaid to those parties on the attached Service List.

/s/ Karen M. Crowley